

substantial additional factual allegations based on discovery obtained in this lawsuit to date. The Third Amended Complaint also added six individuals as defendants to this case who previously were not parties to this lawsuit. The Third Amended Complaint also added eight additional causes of action that previously were not asserted in this lawsuit.

Plaintiffs requested issuance of a summons for each of the newly added Defendants on November 1, 2024 and intend to act expeditiously to have each of the new Defendants served with process for the Third Amended Complaint.

Counsel for all parties in this case prior to the filing of the Third Amended Complaint have scheduled a videoconference meeting for November 6, 2024 to begin the process of discussing a revised case schedule in light of the new party defendants added to this case. All currently represented parties are unopposed to a 30-day abatement of current case deadlines to allow the existing parties to discuss a revised case schedule, and to permit Plaintiffs to effectuate service of process for newly-added Defendants. This request would apply to the following case deadlines set to run within the next 30 days:

- Plaintiffs' Expert Disclosure Deadline – November 4, 2024; and
- Defendants' Rebuttal Expert Disclosure Deadline – November 15, 2024.

Plaintiffs are unopposed to the filing of a joint status report regarding the case schedule and other case issues as the Court may request. Plaintiffs also are unopposed to setting a status conference with the Court should the Court choose to hold one.

Dated: November 4, 2024

Respectfully Submitted,

/s/ Donald Puckett

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CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with counsel for all parties that previously have answered and appeared in this case (City of Erwin, Unicoi County, Michael Hensley, Jonathan Rogers, and Tony Buchanan), and all such counsel are unopposed to the relief requested in this Motion.

/s/ Donald Puckett

Donald Puckett

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Donald Puckett

Donald Puckett